

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES PRACTICES,
AND PRODUCTS LIABILITY
LITIGATION

MDL NO. 16-2738 (FLW) (LGH)

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' FRCP 30b6 NOTICE OF TAKING ORAL
DEPOSITION OF THE PERSON MOST KNOWLEDGEABLE
OF JOHNSON & JOHNSON**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, Plaintiffs, by and through the undersigned counsel, hereby notice the videotaped deposition upon oral examination of the Johnson & Johnson person most knowledgeable regarding the topics listed in Exhibit A in the above-referenced matter.

PLEASE TAKE FURTHER NOTICE that pursuant to the Federal Rules of Civil Procedure, Plaintiffs further request that the documents identified in Exhibit B be produced in advance of the deposition. The deposition will take place before a person authorized to administer oaths and will continue until completed at the following time and place:

September 8, 2021, at 10:00 a.m. (EST)
Conference Room at
Faegre, Drinker, Biddle & Reath
600 Campus Drive
Florham Park, NJ 07932

The deposition will be videotaped before a certified court reporter and may be used for the purposes of discovery or for use by Plaintiff as evidence at trial, or both. You are invited to appear and take part in the examination as you deem appropriate.

Dated: July 15, 2021

Respectfully submitted,

/s/ Michelle A. Parfitt

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

/s/ Michelle A. Parfitt

Michelle A. Parfitt
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ATTORNEY FOR PLAINTIFFS

EXHIBIT A

The representative of J&J with the most knowledge concerning the existence and location of the following documents:

1. The original "FDA call file";
2. All nonprivileged information contained in the original files for all cases listed in Exhibit I of the Stock Purchase Agreement between Cypress Mines Corporation & Johnson & Johnson dated January 6, 1989, including but not limited to pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
3. All original files set forth in the listing of files attached to memo of Rebeca Farlow (JJ-89346);
4. Original talc documents located in the 4 file drawers referenced in the November 21, 2008 email from Bernhofer to McCarthy;
5. All document preservation notices issued by J&J or its attorneys affecting any case alleging injury from exposure to JJ talc;
6. A listing of all powder items destroyed as set forth in the October 20, 2000, memo from Payeur to Ashton (JJ-15761) along with the testing results related to each of the destroyed samples;
7. The following original items set forth in the October 20, 2000 memo from Payeur to Ashton (JJ-15761)
 - o historical talc file Fromm the Kilmer Museum;
 - o asbestiform mineral samples and purchased standards;
 - o card file with mine locations;
 - o photomicrographs of talc.
8. The materials and books referenced in the October 20, 2000, email from Hopkins to Chudkowski (JNJ 0635);
9. Original file of *Theresa Krushinski v. JCCP*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
10. Original file of *Westfall v. Windsor Minerals*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
11. Original file of *Coker v. JCCP*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
12. The original entire McCrone file sent to John O'Shaughnessy by McCrone on January 3, 1995;
13. A listing of all records concerning the Hammondsville mine destroyed by mine management as referenced in the November 23, 1993, trip report from Denton to Ashton;
14. All EPA Level II TEM Analysis, Qualitative Element Identification, Photomicrographs associated with all asbestos testing performed by McCrone for J&J or Windsor Minerals;
15. A listing of all talc samples sent to McCrone for testing & destroyed by McCrone while litigation was contemplated or pending against J&J, JJCI or Windsor Minerals;
16. Original file of *Edley v. Windsor Minerals Inc.*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and responses and motions;

17. Original file of *Yuhas v. JCCP*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
18. Original file of concerning the *Wysoker* case referenced in the August 27, 1986, letter from Beider to Ronald Grayzel including but not limited to pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
19. Original file of *Joly v. J&J*, including but not limited to pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
20. Original file of *Aprea v. Windsor Minerals Inc.*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
21. Original file of *Cunningham v. J&J*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
22. Original file of *Selby v. J&J*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
23. Original file of *Ritter v. J&J*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
24. Original file of *Durham v. J&J*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
25. Original file of *Lopez v. J&J*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
26. A listing of all materials supplied to Professor Barry Doolan in the case of *Ritter v. Windsor Minerals Inc.*;
27. All testing documents sent by Luzenac to John O'Shaughnessy as referenced in the letter from O'Shaughnessy dated April 16, 1998;
28. J&J meeting minutes for Skillman meetings with Rio Tinto, Michael Huncharek and Joshua Muscat in January 2007 and November 2008 concerning studies proposed by Huncharek and Muscat to investigate ovarian cancer and the 2008 Citizen's Petition; and
29. Communications concerning a proposal (JNJ000017587) and preliminary results of a meta-analysis (JNJ00007613) performed by Michael Huncharek, MD of perineal talc exposure and ovarian cancer risk, including payments made and communications with legal counsel.

EXHIBIT B

Documents to produce whether in possession of J&J or its counsel:

1. The original "FDA call file";
2. All nonprivileged information contained in the original files for all cases listed in Exhibit I of the Stock Purchase Agreement between Cypress Mines Corporation & Johnson & Johnson dated January 6, 1989, including but not limited to pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
3. All original files set forth in the listing of files attached to memo of Rebeca Farlow (JJ-89346);
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11. Original file of *Coker v. JCCP*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
12. The original entire McCrone file sent to John O'Shaughnessy by McCrone on January 3, 1995;
13. A listing of all records concerning the Hammondsville mine destroyed by mine management as referenced in the November 23, 1993, trip report from Denton to Ashton;
14. All EPA Level II TEM Analysis, Qualitative Element Identification, Photomicrographs associated with all asbestos testing performed by McCrone for J&J or Windsor Minerals;
15. A listing of all talc samples sent to McCrone for testing & destroyed by McCrone while litigation was contemplated or pending against J&J, JICI or Windsor Minerals;
16. Original file of *Edley v. Windsor Minerals Inc.*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and responses and motions;

17. Original file of *Yuhas v. JCCP*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
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21. Original file of *Cunningham v. J&J*, including but not limited to, pleadings, sworn statements, correspondence, depositions, discovery requests and responses, and motions;
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29. Communications concerning a proposal (JNJ000017587) and preliminary results of a meta-analysis (JNJ00007613) performed by Michael Huncharek, MD of perineal talc exposure and ovarian cancer risk, including payments made and communications with legal counsel.